



# City of Martinez

525 Henrietta Street, Martinez, CA 94553-2394

JERRY BOYD  
CHIEF OF POLICE

RECEIVED

DOCKET FILE COPY ORIGINAL

Police Department

MAY 24 1993

(510) 372-3545

FAX (510) 228-3753

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RECEIVED

... COMMITTED TO EXCELLENCE AND SERVICE

May 18, 1993

MAY 24 1993

FOR MAIL ROOM  
RECEIVED

MAY 24 1993

Federal Communications Commission  
1919 M Street N.W. Room 222  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ATTENTION: Ms. Donna R. Searcy, Secretary

RE: PR Docket No. 92-235

In the matter of the revision of the Private Land Mobile Radio (PLMR) Services and the modification of the policies governing those services (PR Docket No. 93-235, the replacement of Part 90 by Part 88), we have the following comments:

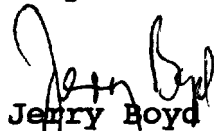
1. WE DISAGREE WITH PR DOCKET 92-235 AS IT IS CURRENTLY PROPOSED.
2. The City of Martinez Police Department within the past several years has, at a tremendous expense, replaced the majority of its police radio system. The equipment purchased was "state of the art" at the time. The replacement of the Police radio equipment is normally done on a ten to fifteen year cycle, and we would not again be due to replace our radio equipment until at least the year 2005. The proposed requirements of PR Docket 92-235 would result in a substantial expense to this City, and given California's present budget crisis, an expense that we are not at all prepared to meet.
3. If PR Docket 92-235 is enacted as proposed, it essentially mandates the replacement of our existing radio equipment. Since we clearly will not have the funds to do so, any change in current Federal law should provide for a changeover funding source so that the provisions of PR Docket 92-235 can be implemented without a hardship on local taxpayers.
4. It is our opinion, and that of our countywide Emergency Communications Advisory Board, that if PR Docket 92-235 is implemented without modifications that current licensees such as our city should retain a license for all the narrow band channels which will be developed out of the existing wide band channels. Such continuation as the licensee should exist up until the year 2005. This will give local governments such as ours the time required to make equipment changes and budget equipment replacement over a reasonable time frame.

No. of Copies rec'd \_\_\_\_\_  
List A B C D E

Federal Communications Commission  
May 17, 1993  
Page 2

5. We disagree that the frequency coordinating agencies would manage their proposed major role in administering channel exclusivity, and therefore, insist the public safety agencies be able to retain their control over the radio traffic. If channel exclusivity is lost, public safety agencies' ability to respond to emergency requests from the public will suffer significantly.
6. We urge the members of the Federal Communications Commission to seek input from local, regional, and state communications directors. To place the burden and cost of the problems addressed in this legislation on the backs of local government is not an appropriate answer.

Respectfully submitted,

  
Jerry Boyd  
Chief of Police